

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

**STAFF REPORT FOR REGULAR MEETING OF MARCH 23, 2007
Prepared February 28, 2007**

ITEM NUMBER: 8

SUBJECT: Issuance of NPDES Municipal Storm Water Permit Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Phase II Storm Water Permit), San Luis Obispo County

KEY INFORMATION

Location: County of San Luis Obispo
Discharge Type: Municipal Storm Water
Existing Orders: None
This Action: Adopt Resolution No. R3-2007-0019 Approving San Luis Obispo County Storm Water Management Program

SUMMARY

This item presents draft Resolution No. R3-2007-0019, which approves the County of San Luis Obispo's (County) Storm Water Management Program (SWMP). A Water Board approved SWMP is required to enroll the County in the NPDES Municipal Storm Water Permit for Small Municipal Separate Storm Sewer Systems (General Permit, or Phase II Storm Water Permit). This report provides background information regarding the County's SWMP development and a staff recommendation for SWMP approval. The County submitted three SWMP drafts over a three-year period. Five interested parties requested a public hearing based on their review of the County's SWMP. The Resolution contains staff recommended SWMP modifications based on comment letters

received from interested parties and discussions with the County.

By adopting the Resolution, the Water Board will enroll the County in the General Permit. The County will then be required to implement the storm water management program which is designed to reduce pollutant discharges in urban storm water to the maximum extent practicable.

DISCUSSION

The County is required by Clean Water Act §402(p) to obtain permit coverage pursuant to the General Permit. The keystone of the Phase II Storm Water permit program is the SWMP, which is written by the permit applicants.

The County developed a SWMP with input from Water Board storm water

staff and members of the local communities. The County submitted their initial SWMP and Notice of Intent to comply with the General Permit on March 10, 2003. Water Board staff deemed the SWMP incomplete, made comments, and returned the SWMP to the County for revisions. This review-revision process was repeated several times until we arrived at a "final" version, dated April 2004. Water Board staff accepted the SWMP as meeting the requirements of the General Permit, and posted it on the State Board website for a 60-day public comment period which ended December 10, 2004. Water Board staff received several comment letters. The County worked to revise the SWMP based on the comment letters and the Natural Resources Defense Council report entitled "A Practical Plan for Pollution Prevention: Urban Runoff Solutions for the Monterey Region" (Report). The County submitted a revised SWMP in June 2006.

Water Board staff determined that the SWMP met the requirements of the General Permit and posted the document for a 45-day public comment period on August 22, 2006. Water Board staff received additional comments during the comment period and scheduled a hearing for the March 2007 Water Board meeting. Water Board staff is recommending several minor modifications to the SWMP in the attached resolution.

San Luis Obispo County Storm Water Management Program Summary

The SWMP describes the organizational framework under which the County will work to accomplish the objectives of their storm water program. It contains a description and maps of the areas to be covered by the NPDES permit for which the program was prepared. It also

describes Best Management Practices (BMPs) with justification for BMP choices, Measurable Goals, and implementation timeframes. The County has five years to develop and implement a program which reduces pollutants in storm water runoff to the maximum extent practicable and protects water quality. The County will submit annual reports detailing program compliance, BMP effectiveness, and Measurable Goal status. Water Board staff will review annual reports and work with the County to improve program implementation and effectiveness.

The purpose of the SWMP is to implement and enforce a series of BMPs. These BMPs are designed to reduce the discharge of pollutants from the municipal separate storm sewer systems to the "maximum extent practicable," to protect water quality, and to satisfy the requirements of the Clean Water Act. The County will use a series of measurable goals, defined in the SWMP, to gauge the effectiveness of the program.

The BMPs are grouped under the following six "Minimum Control Measures," which are required under the Phase II regulations:

1. Public Education and Outreach
2. Public Participation/Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post-Construction Runoff Control
6. Pollution Prevention/Good Housekeeping

The SWMP contains those BMPs and Measurable Goals that the County believes will be most useful and effective in reducing the discharge of

pollutants from storm sewer systems within the particular geographic area and land uses covered by this permit. The following paragraphs include examples of County developed BMPs, goals, and key measures to gauge the effectiveness of the SWMP for each Minimum Control Measure. The results obtained from the key measures will help guide improvements in the SWMP over its first five-year term.

1. Public Education and Outreach

The SWMP incorporates numerous public education BMPs. These include outreach brochures, a website, participation in community events, a storm water icon, slogan and logo, educational programs for school children, storm drain marking, storm water hotline, the Our Water Our World Program, and television and radio advertising.

The overall goal of the Public Education and Outreach Minimum Control Measure is to inform the public about the importance of protecting water quality. Specific public education goals include increasing public awareness 50% in first permit term, reaching 180,000 households twice a year with television public service announcements, distributing printed educational materials to all residential, commercial, industrial, and contractor audiences at least every three years, educating 35% of school aged children every year, and participating in at least ten public events per year.

The key measure of success will be the County's public opinion surveys during permit-years one, three, and five to evaluate the public's storm water knowledge. The County will also track the number of calls to the storm water hotline.

2. Public Participation

The County will engage the public in storm water issues through the SWMP. The County will organize and conduct two stakeholder meetings per year to allow public input regarding SWMP performance and improvements. The County will organize creek and beach cleanup events, will recruit community volunteers to conduct storm drain marking, will support Urban Watch, First Flush, and Snapshot Day citizen's monitoring programs, and will promote County Adopt-a-Road and Adopt-a-Creek programs.

The overall goals of the Public Participation Minimum Control Measure are to include the public in the SWMP implementation and decision-making process and foster broader public support for the SWMP. Specific public participation goals include organizing and sponsoring three creek and beach cleanup events per year, using volunteers to mark all storm drains in the County permitted area by the end of permit year three, and increasing participation in the Adopt a Road and Adopt a Storm Drain programs by 10% per year.

Key measures of success will include increased public meeting attendance and participation. The County will also document and track the amount of materials collected during creek and beach cleanups and the number of citizens participating in the cleanup events.

3. Illicit Discharge Detection and Elimination

The County will draft, adopt, and implement a storm water ordinance prohibiting illicit discharges and providing the County with enforcement authority. The County will map the

entire storm drain system and will inspect the entire storm drain system for illicit discharges twice per year. The County will post signs in areas with chronic illegal dumping and will adopt a pet waste ordinance.

The overall goal of the Illicit Discharge Detection and Elimination Minimum Control Measure is to eliminate pollutant discharges from illicit sources. Specific goals include adopting a storm water ordinance by the end of year two, mapping the storm drain system by the end of year two, inspecting the entire storm drain system twice per year starting in year one, posting signs at the top ten areas for illegal dumping by the end of year three, and adopting a pet waste ordinance in year two.

The key measure of success will be the number of illicit discharges detected and eliminated through program implementation. The County will track and evaluate trends in the number and types of illicit connections and discharges that are reported or discovered through inspections, and eliminated.

4. Construction Site Runoff Control

The County will revise its grading ordinances to update erosion and sediment control requirements. The County will implement procedures for reviewing grading plans to verify BMPs are included and adequate prior to issuing permits and will implement a construction site inspection program to verify BMP implementation.

The goal of the Construction Site Runoff Control Minimum Control Measure is to prevent sediment and other construction waste from entering the storm sewer system. The County will require all construction sites to implement County approved erosion and sediment control

plans. The County will develop inspection procedures and County inspectors will conduct site inspections to evaluate construction site BMP implementation and ensure sites are properly implementing site erosion and sediment control plans.

All County grading inspectors and planners will receive annual storm water BMP training. The County will also hire dedicated construction storm water inspectors to verify construction sites are implementing required BMPs.

Key measures of success will be the number of construction sites in compliance with (and the number in violation of) county requirements, the number of enforcement actions taken, the number of complaint calls from the public, and the types of violations documented during site inspections.

5. Post-Construction Runoff Control

The General Permit Attachment 4 Design Standards, also called "Supplemental Provisions," establish minimum BMP requirements that stress (i) low impact design; (ii) source controls; and (iii) treatment controls. Attachment 4 Design Standards are required for "areas subject to high growth or serving a population of at least 50,000." The County serves a population greater than 50,000 and therefore is required to implement the Attachment 4 design standards. The County will revise its land use ordinances to incorporate all Attachment 4 design standards and will review all construction plans for compliance with the requirements.

The County will develop and implement a Low Impact Development (LID) Design Standards Manual and will

provide the manual to the development and construction industry. The County applied for and received \$1.05 million in grant funds to construct two LID projects. With County matching funds the project budgets total \$1.3 million.

One project, located in Santa Margarita¹, includes design and construction of an LID demonstration/pilot project, development of an LID design standards manual, and review of the County ordinances needed to implement LID. The other project is an LID demonstration project in Templeton² including a report that will be developed and used to help update County Public Works Standards and encourage the use of LID within the County.

The County will develop an incentive program to encourage use of LID integrated management practices.

The goals of the Post-Construction Runoff Control Minimum Control Measure include applying Attachment 4 requirements to all applicable projects during the planning review process, taking enforcement actions against all non-compliant projects, and establishing LID as the design standard for development within San Luis Obispo County.

The key measures of success will be the number of post-construction sites that meet the requirements (determined by site inspections and self-reporting) and the number of projects implementing LID design standards.

¹ Proposition 40 Urban Stormwater Program Grant 06-214-553-0, Implementation of Low Impact Development and Design Standards in San Luis Obispo County

² Proposition 40 Urban Stormwater Program Grant 06-216-553-0, Florence Street LID Pedestrian Improvements, County of San Luis Obispo

6. Pollution Prevention/Good Housekeeping

The County's municipal operations program will include training all pertinent staff annually, initiating a street sweeping program, implementing a storm sewer cleaning and maintenance program, developing and implementing storm water pollution prevention plans for all County corporation yards, developing and implementing a County road and bridge maintenance procedures manual, inspecting County facilities, and ensuring proper vehicle maintenance and washing.

The overall goal of the Pollution Prevention and Good Housekeeping for Municipal Operations Minimum Control Measure is to provide public services in a manner that protects water quality. Specific goals include training all County staff annually, sweeping County roads with curbs and gutters quarterly, inspecting and cleaning the entire storm drain system twice per year, and inspecting County facilities annually, correcting all deficiencies.

Key measures of success will be training all County staff annually (staff will be tested and must score at least 70% or will have to take the class again), tracking the amount of material collected through street sweeping operations, tracking trends in the amount of material removed from the storm drain system, and compliance with internal facility inspections.

Water Quality Monitoring

Water quality monitoring is not a General Permit requirement, but the Water Board and the Executive Officer may require it at any time. The County will organize Snapshot Day, First Flush, and Urban Watch water quality

monitoring in addition to the key measures of success noted above. The County will work with local groups to develop and implement volunteer monitoring in year one. Water Board staff will review the monitoring program during the annual report review process to determine if it is adequate to measure SWMP effectiveness. If the County's monitoring program is not adequate, the Executive Officer will require additional monitoring.

PUBLIC COMMENTS

The June 2006 SWMP (Attachment 1) was posted for 45-day public comment period. Five groups submitted comments on the SWMP including the Natural Resources Defense Council (NRDC), San Luis Obispo Coastkeeper, the Sierra Club, the Surfrider Foundation, and EcoSLO.

The draft Resolution was posted for 30-day public comment period. Atascadero, the City of San Luis Obispo, the Los Osos Community Services District (CSD), the Nipomo CSD, Lana Davis, and Ditas Esperanza submitted letters supporting approval of the County's SWMP. The Sierra Club, San Luis Obispo Coastkeeper, and NRDC submitted comment letters on the draft Resolution.

Water Board staff response to NRDC, San Luis Obispo Coastkeeper, the Sierra Club, the Surfrider Foundation, and EcoSLO comments are included as Attachments 9, 10, 11, 12, and 13 respectively.

Water Board staff posted a May 2004 version of the SWMP in October 2004 for 60-day public comment period. The NRDC and Richard Horner submitted comment letters based on the May 2004 SWMP. Water Board staff response to NRDC and Richard Horner comments

are included as Attachments 9 and 14 respectively.

The three main topics in the following section reflect the primary concerns that remain between the commenters, the County, and Water Board staff.

A. Lack of Coordination Among Municipal Entities

The commenters are concerned with what they perceive as a lack of coordination among the municipal entities within San Luis Obispo County on the development and implementation of their respective storm water management programs.

The County participates in the San Luis Obispo County Partners for Water Quality meetings attended by city and county staff bimonthly. The meetings provide an opportunity for storm water program coordination between the various entities. Topics for discussion are suggested by participants and include development and interpretation of storm water regulations, opportunities for cooperative efforts, emerging technologies and sharing of water quality information. Although Water Board staff encourages sharing resources and program implementation where possible, the County is not required to share resources or responsibility for program implementation with other entities.

Water Board staff recommend continued participation in the San Luis Obispo Partners for Water Quality meetings. The meetings should provide an adequate forum to coordinate storm water related issues with other municipal entities in the County.

The Water Board can issue regional or watershed-wide permits instead of approving SWMPs submitted by

individual jurisdictions (i.e., the County has a separate SWMP from the incorporated cities within the County). Staff does not recommend this option unless the permittees elect to prepare a joint SWMP, because of the potential difficulties and delays in getting the various communities to work together

B. Water Quality Monitoring

The commenters contend that the County should include water quality monitoring in the SWMP.

Water quality monitoring is not a General Permit requirement, but the Water Board may require it. As stated above, the County will organize and sponsor volunteer Snapshot Day, Firstflush, and Urban Watch water quality monitoring. Water Board staff will review the monitoring program during the annual report review process to determine if it is adequate to measure SWMP effectiveness. If County's monitoring program is not adequate, the Executive Officer will require additional monitoring.

C. Sea Otters

The commenters are concerned that, based on numerous scientific articles, storm water pollution contributes to Southern Sea Otter mortality and morbidity in San Luis Obispo County's receiving waters and that the SWMP fails to adequately address the problem.

The SWMP includes BMPs to help address Southern Sea Otter mortality off the County's coast. Recent studies indicate that there may be a correlation between toxoplasma gondii infection in Southern Sea Otters and coastal runoff. Toxoplasma gondii is associated with Southern Sea Otter mortality. The toxoplasma gondii parasite has been traced to humans and terrestrial

animals. However, toxoplasma gondii cysts are only excreted by cat species. A potential toxoplasma gondii source may be urban runoff carrying cat waste infected with the parasite. The County's public education and outreach program will emphasize sea otter protection, utilizing educational outreach materials and radio and television public service announcements. The County will distribute pet waste educational material at animal shelters, pet stores, 4H clubs, veterinarian offices, and farm supply stores. The County will promote nonprofit organizations dedicated to trap, neuter, and release/adoption programs for feral cats. The County will promote spay and neuter programs to reduce feral populations and will provide pet spay and neuter educational materials to promote responsible pet ownership through the Animal Services Division. A recent study³ on outdoor fecal deposition points out that, "Long-term efforts to control cat populations in the Morro Bay area will depend on spaying and neutering feral cats and ongoing public education urging responsible pet ownership."

Water Board staff recommend that the County implement the proposed BMPs while continuing to evaluate research into Southern Sea Otter mortality and potential toxoplasma gondii sources in urban runoff.

The intent of the Storm Water General Permit is to protect water quality through storm water management programs that are implemented over a five-year period. The General Permit intends for storm water programs to address and abate local pollutants of concern. Water

³ Dabritz, H.A. et al., *Outdoor Fecal Deposition by Free-roaming Cats and Attitudes of Cat Owners and Nonowners Towards Stray Pets, Wildlife, and Water Pollution*, Journal of American Veterinary Medical Association, Vol 229, No. 1, 74-81.

Board staff will review the County's program on an annual basis to evaluate program implementation and effectiveness.

Staff's recommendation includes requiring a list of changes to the SWMP. These changes are included in the proposed resolution and discussed below.

In summary, Water Board staff believes that the SWMP will meet or exceed MEP in the initial permit term; that there is ample evidence that the objective of the County is to comply with the letter and the intent of the General Permit; and that the level of detail in the SWMP is adequate for reviewers to understand and evaluate. The County has demonstrated they will develop and implement a program that will reduce pollutants to the maximum extent practicable.

The Storm Water Management Plan was posted to the Regional Water Board website and a notice was electronically mailed on August 22, 2006, to all persons listed on the interested parties list. Comments for the SWMP were due back to the Water Board by October 6, 2006. Water Board staff posted the draft Resolution R2-2007-0019 for public comment and sent a notice electronically on January 23, 2007. Comments on the draft resolution were due back to the Water Board on February 26, 2007.

PUBLIC HEARING

The Water Board will hold a public hearing to consider enrolling the County of San Luis Obispo in the Phase II Storm Water Permit. The public hearing is scheduled for March 23, 2007, in San Luis Obispo, at the address listed in the next paragraph. The hearing agenda will be posted to the Water Board website,

<http://www.waterboards.ca.gov/centralcoast/>.

Interested parties can obtain further information regarding the conduct and nature of the public hearing concerning this draft resolution by writing or visiting the Central Coast Regional Water Quality Control Board office, at 895 Aerovista Place, Suite 101, San Luis Obispo, CA 93401, attention Ryan Lodge, (805) 549-3506, or rlodge@waterboards.ca.gov.

RECOMMENDATIONS

Water Board staff recommend the Board adopt Board Resolution R3-2007-0019 accepting the June 2006 San Luis Obispo County Storm Water Management Program as complete, approve San Luis Obispo County enrollment in the Phase II General Permit, and require the County to make the following changes to their SWMP:

1. BMP PE3A indicates the County will reach 180,000 households with public service announcements. The BMP should state the County will reach 180,000 **individuals** instead of households.
2. BMP PE8A must include the following language: "One acre or more in size and smaller projects that are part of a larger common plan of development that is one acre or larger for all purposes under this SWMP."
3. BMPs PE10B and PE10C must clarify that the County will provide the activity books for **all** pre-school through grade one children and the educational materials and activities for **all** pre-school through grade six children enrolled in public schools within the permit coverage area.

4. The County must specify the number and type of public events at which Sammy the Steelhead makes appearances in each annual report. Annual reports must include specific information about all events and programs cosponsored by the County that are listed throughout the SWMP, including the number and type of events/programs anticipated for the upcoming year, and the County's role in those events and programs.
5. Add BMP PE12D to identify and rank all high tourist impact areas within the permit coverage area in permit year one, and revise each year if necessary. The list will be used to post pollution prevention signage at the top three tourist impact areas (BMP PE12C).
6. In BMP PE14B change the word promote to publicize.
7. For BMP PE 15B the County must clarify that it will establish the speaker's bureau in permit year one and maintain it annually. The County must clarify that it will track the number of available speakers and utilization of the speaker's bureau annually.
8. For BMP PE18A the County must track the number of mitt mitts supplied annually. For BMP 18B the County must annually track the number enforcement actions beginning in permit year three.
9. The County must clarify that it will identify high impact areas in the permit coverage area in year one and will provide interpretive signage in all high impact areas beginning in year two for BMP PE19H.
10. The County must specify, in BMP PE25D, that the Clean Water Business Recognition Award and Certification program will be developed in permit year one and will be implemented beginning in permit year two. The County must provide a description of the program in the first annual report.
11. The County must require storm drain marking on all new development projects with storm drains for BMP PP4B.
12. BMP PP4C must include a provision to provide a storm drain marker maintenance schedule in the first annual report.
13. The County must clarify that the ordinance drafted and adopted for BMP IL1A will include progressive penalties and enforcement provisions and that ordinance enforcement will begin as soon as it is adopted.
14. The County must include a commitment, in BMP IL4C, to implement the enforcement and penalty provisions of the adopted ordinance from BMP IL1 in permit years three through five.
15. The County must include a BMP in IL4 to train restaurant health inspectors in illicit discharge detection and elimination. The County must inspect 100% of restaurants annually through the health inspection program. Health inspectors will report all storm water violations to the Public Works Department for follow-up. For violations that occur within the permit coverage area, the County must follow up on all reports, and include response actions and response times in the Annual Report.
16. The County must include a BMP in IL4 to train CUPA inspectors in illicit discharge detection and elimination. CUPA inspectors

- must report all storm water violations to the Public Works Department for follow-up. For violations that occur within the permit coverage area, the County must follow up on all reports, and include response actions and response times in the Annual Report.
17. Add to IL6A: "Correct 100% of problems detected in the audit."
 18. The County must ensure septic system inspections (BMP IL7C) are conducted by qualified County personnel or by contractors with a C42 contractor's license. Inspection reports shall include, at a minimum, all information on the San Luis Obispo County Septic Tank Inspection Form and Septic Verification Form. The County must identify, map and inspect both private and County owned septic systems.
 19. In conjunction with BMP IL8, the County must develop and implement a plan to address illegal dumping in all permit areas, including periodic inspections, cleanup, and criminal or civil penalties. The County must develop the plan by permit year three and implement the plan in permit years three through five.
 20. The County must commit to respond to 100% of storm water reports associated with the Pollution Prevention Hotline in BMP IL3C.
 21. Clarify that the County will revise the grading ordinances in BMP CON1A by the end of permit year two.
 22. Clarify that the County will establish protocols to ensure construction project proponents have coverage under the General Stormwater Construction Permit in permit year one and implement protocols in permit years two through five for BMP CON2B.
 23. For BMP CON3A the County must create procedures for construction site inspections in permit year one and implement those procedures in permit years two through five. This schedule must include hiring (if necessary) and training all inspectors in permit year two.
 24. On page 59 of section 4, BMP CON6 does not contain an implementation timetable. The County must include a timetable in for CON6, which includes annual implementation starting in permit year one.
 25. The County must indicate, in BMP CON7B, that they will respond to 100% of citizen reports.
 26. The County must clarify, in BMP PC1A, that they will adopt the final ordinance/revisions and begin enforcement by the end of permit year three.
 27. The County must clarify that the revised CEQA checklist for BMP PC2A will be implemented by the end of permit year three.
 28. The County must include language in BMP PC5A indicating that compliance with the Attachment 4 design standards required in the ordinance described in PC1 will be mandatory for all new projects one acre or more in size and smaller projects that are part of a larger common plan of development that is one acre or larger. The LID Design Manual is required to provide design specifications and guidance to help project proponents achieve compliance with the ordinance.

29. Indicate, in BMP PC9A, that the County will include policies for post-construction stormwater management in the revised Conservation Element of the General Plan. Policies are codified and enforced through County ordinances.
30. For BMP MO1A, clarify that each County municipal operations employee will be trained annually.
31. As a part of BMP MO2A the County must identify heavily soiled areas or other areas that will require street sweeping more frequently than quarterly. The County must explain how they will identify areas for more frequent street sweeping in BMP MO2A. The County must include a BMP for sweeping County-owned parking lots and include parking lots in the frequency analysis in BMP MO2A. The County must commit to track curb miles swept and the amount of material collected annually.
32. In BMP MO3A the County must clarify that the storm sewer collection system inspection program will include inspecting all catch basins and other storm drain components twice per year. Catch basins and other storm drain components will be cleaned at least twice per year unless the inspections demonstrate that cleaning is not necessary.
33. Clarify that for BMP MO5B the County will develop road and bridge maintenance procedures in permit year two and will begin implementing the procedures in permit year two.
34. The County must commit to responding to 100% of noncompliance conditions and tracking all noncompliance, corrective, or preventive action and response times associated with County facility inspections for BMP MO6.
35. The County must commit to maintaining oil water separator systems described in MO9 at least semi-annually.
36. The County must include a BMP to provide at least 30-day public comment period before adoption of each of the following. Notice shall be provided (but not limited) to the Central Coast Water Board's list of interested parties: illicit discharge ordinance (IL1); pet waste ordinance (IL11); grading ordinance (CON1A); inspection procedure and protocol (CON3A); post construction ordinance revisions (PC1A); LID design manual (PC5); and Conservation Element (PC8A).
37. In BMP IL1C, require evaluation of violation **and response** types.
38. In BMP PC4B the County must include language indicating that the self-certification must ensure adequate long-term maintenance of all post-construction BMPs through funding commitments, covenants, maintenance agreements, right-of-entry for inspection or other acceptable methods specified in the ordinance (See PC1A). (For years 1-2, certification will be based on SWMPPs.)
39. The County must include a BMP in PC4 to inspect projects sites one acre or more in size for compliance with statewide General Construction Permit and SWPPP requirements for post construction BMPs starting in permit year two (i.e., these inspections must occur until the

- County begins the PC4A inspections to ensure ordinance compliance).
40. The County must respond to all instances of non-compliance for BMPs MO4B-C and MO7C, and implement corrective actions on 100% of noncompliance issues.
 41. The County must distribute the educational and outreach information and guidance described in CON4 and CON5 to all project applicants, regardless of project size, and post a complete copy of the BMP manual (CON5A) on the website.

ATTACHMENTS

The Attachments to this Staff Report have been provided electronically for the Board Members, with the exception of Russell Jefferies and Monica Hunter, who received hard copies. The attachments to this item are available on the Water Board website,

www.waterboards.ca.gov/centralcoast/stormwater/index.htm

or you may reach staff member Ryan Lodge (contact information listed above on page 7) at the above-listed contact to arrange a document review in person, at the Water Board offices.

1. The June 2006, County of San Luis Obispo County Storm Water Management Program
2. Natural Resources Defense Council October 5, 2006, comment letter.
3. San Luis Obispo Coastkeeper October 2, 2006, comment letter.
4. Sierra Club October 5, 2006, comment letter
5. Surfrider Foundation, October 6, 2006, comment Letter
6. EcoSLO October 5, 2006, comment letter.
7. Natural Resources Defense Council December 10, 2004, comment letter.
8. Dr. Richard Horner December 10, 2004, comment letter.
9. Water Board staff response to Natural Resources Defense Council comment letters.
10. Water Board staff response to San Luis Obispo Coastkeeper comment letters.
11. Water Board staff response to Sierra Club comment letter.
12. Water Board staff response to Surfrider Foundation comment letter.
13. Water Board staff response to EcoSLO comment letter.
14. Water Board staff response to Dr. Richard Horner comment letter.
15. San Luis Obispo County September 11, 2006, Budget Letter.
16. Board Resolution R3-2007-0019.
17. Los Osos CSD February 15, 2007, comment letter.
18. City of Atascadero February 15, 2007, comment letter.
19. Ditas Esperanza February 21, 2007, comment letter.
20. Nipomo CSD February 22, 2007, comment letter.
21. City of San Luis Obispo February 23, 2007, comment letter.
22. Lana Davis February 26, 2007, comment letter.
23. Natural Resources Defense Council February 26, 2007, comment letter.
24. San Luis Obispo Coastkeeper February 26, 2007, comment letter.
25. Sierra Club February 26, 2007, Sierra Club comment letter.
26. Clean the Bay, it's Best for Everyone, May 8, 2005,

- Monterey Herald Article.
27. Board Must Reduce Runoff, February 8, 2006, Monterey Herald Article.
 28. Toxic Runoff, August 3, 2006, Monterey County Weekly Article.
 29. Clean Water Solution August 10, 2006, Monterey County Weekly Article.
 30. Environmental Groups Support Storm Water Plan August 17, 2006 Monterey County Weekly

- Article.
31. End nears for storm runoff dispute, December 17, 2006 Monterey Herald Article.

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